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 Counsel for Defendant BUILD OUR CENTER

UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

DREW RIBAR,

Plaintiff,

Case No. 3:24-cv-00526

v.

WASHOE COUNTY; WASHOE COUNTY
 LIBRARY SYSTEM; JEFF SCOTT; THANH
 NGUYEN; JAMIE HEMINGWAY; BEATE
 WEINERT; STACY MCKENZIE; JONNICA
 BOWEN; BEN WEST; BUILD OUR
 CENTER, INC.; STACEY SPAIN;
 ANGELINE PETERSON; CHRISTOPHER
 DANIELS; DEPUTIES ROTHKIN, SAPIDA,
 GOMEZ; KRISTEN RYAN, JENNIFER
 COLE; and JOHN/JANE DOES 1-10;

Defendants.

**DEFENDANT
 BUILD OUR CENTER'S
 RESPONSE TO
 PLAINTIFF DREW RIBAR'S
 MOTION TO COMPEL E-SERVICE**

Defendant BUILD OUR CENTER INC., by and through its undersigned counsel, respectfully files this response to *Plaintiff's Motion to Compel E-Service* [ECF 131].

This Response is made and based upon all records and pleadings on file herein, together with every exhibit attached hereto (each of which is incorporated herein by reference), as well as the points and authorities set forth directly below.

In support of this Response, BOC states as follows:

MEMORANDUM OF POINTS AND AUTHORITIES

To the extent a response is necessary to *Plaintiff's Motion to Compel E-Service* [ECF 131], BOC responds as follows: BOC filed its *Motion for Case Management Conference, Restraining Order, and Sanctions* based on Mr. Ribar's alarming and escalating conduct from September 8, 2025 through September

1 18, 2025, which included pursuing BOC board members and volunteers at their
2 workplaces and sending numerous vexatious emails to Counsel Kertis and Jerry
3 C. Carter, Esq. To mitigate this concerning behavior and protect its staff, Sierra
4 Crest mailed Mr. Ribar a letter requesting that any communications outside of
5 court filings be sent via U.S. Mail. The letter did not restrict his ability to file
6 documents electronically or through e-filing. This is a reasonable and proper
7 precaution. The Court should disregard Mr. Ribar's "Motion to Compel."

8 DATED September 30, 2025. SIERRA CREST BUSINESS LAW GROUP

9
10 /s/ Alison R. Kertis, Esq.

11 By: _____

12 Alison R. Kertis Esq.
13 jcarter@sierracrestlaw.com
14 Alison R. Kertis, Esq. (NSB 38???)
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18 Counsel for Defendant Build Our Center
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CERTIFICATE OF SERVICE

I certify that I am an employee of the SIERRA CREST BUSINESS LAW GROUP who, on the below-written date, caused a true copy of the foregoing to be transmitted via email and also to be filed using the above-entitled Court's electronic filing (CM/ECF) system which will automatically e-serve the same) on the person(s) and/or entity(ies) set forth directly below:

Drew Ribar

480 Pershing Lane, Washoe Valley, NV 89704
(775) 223-7899
const2audit@gmail.com
Plaintiff in propria persona

Lindsay L. Liddell (SBN 14079)

Andrew Cobi Burnett (SBN 16505)

DEPUTY DISTRICT ATTORNEYS

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cburnett@da.washoecounty.gov

(775) 337-5700

Counsel for Plaintiffs Washoe County and its Library System, Jeff Scott, Stacy Mckenzie, Jonnica Bowen, Jennifer Cole; Deputy C. Rothkin, Deputy R. Sapida, and Sgt. George Gomez

DATED: September 30, 2025.

/s/ Monica R. Leazer

an employee of the
SIERRA CREST BUSINESS LAW GROUP

INDEX OF EXHIBITS

to

DEFENDANT BUILD OUR CENTER'S RESPONSE TO
PLAINTIFF DREW RIBAR'S MOTION TO COMPEL E-SERVICE

re

Ribar vs. Washoe County, et alia
(Case No. 3:24-cv-00526)

Exhibit No.	Exhibit Description	Pages (+ Cover)
	None,	
	Not applicable.	